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August 7, 1989

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. Alex D. Felker
Chief
Mass Media Bureau
Federal Communications Commission
1919 M Street, Northwest
Room 314
Washington, D. C. 20554

In re: **Request of A. C. Nielsen Company for
Permissive Authority to Use Line 22 of
"Active Portion" of Television Video Signal
for Transmitting Encoded Advertising and/or
Program Identification Information, Filed by
Letter of Counsel Dated July 19, 1989.**

Dear Mr. Felker:

This law firm represents Airtrax, a general partnership organized under the laws of the State of California ("Airtrax"), which has developed and is in the process of bringing to market a system for utilizing Line 22 of the television active video signal for the purposes of encoding, storage, retrieval, and transmission of television advertisement broadcast verification data and related information.

By letter to you from its communications counsel dated July 19, 1989, A. C. Nielsen Company ("Nielsen") has asked for the Commission's permissive authority to use Line 22 for the purpose of transmitting encoded advertising and/or program identification signals.

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Mr. Alex D. Felker
August 7, 1989
Page 2

By letter of the undersigned dated and filed with the Commission's staff on July 28, 1989, Airtrax advised the Commission's staff of certain concerns held by Airtrax with respect to Nielsen's request. In our letter, we asked the Commission's staff to defer action upon Nielsen's request for a period of ten (10) days, to and including today's date, in order to afford Airtrax a sufficient opportunity to marshall and to present to the Commission's staff a more complete written exposition in regard to Nielsen's request.

The purpose of this letter is to advise the Commission's staff that Airtrax's written presentation on Nielsen's request will be filed with the Commission's staff tomorrow, Tuesday, August 8, 1989.

Due to delays in the coordination between undersigned counsel and Airtrax's principals in the preparation of Airtrax's presentation, one (1) day more than originally anticipated has been required in order to complete the process. Airtrax trusts that the Commission's staff and Nielsen will not be substantially inconvenienced by the one (1) day delay.

In the event that the Commission should have any questions concerning this matter, kindly direct them to the undersigned communications counsel to Airtrax.

Very truly yours,



John G. Johnson, Jr.

cc: Grier C. Raclin, Esquire
Counsel to A. C. Nielsen Company

Roy J. Stewart, Esquire
Chief, Video Services Division, Mass Media Bureau,
Federal Communications Commission
1919 M Street, Northwest, Room 702

Stephen F. Sewell, Esquire
Assistant Chief, Video Services Division, Mass Media
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Mr. Alex D. Felker

August 7, 1989

Page 3

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Mr. Gordon Godfrey
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